

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10581 NMG

YVETTE LOCKHART-BEMBERY,)
Plaintiff)
VS.)
)
TOWN OF WAYLAND POLICE DEPARTMENT,)
ROBERT IRVING, in his capacity as CHIEF OF THE)
WAYLAND POLICE DEPARTMENT and)
DANIEL SAURO)
Defendants)

PROPOSED JUROR QUESTIONS TO BE ADDRESSED TO THE VENIRE:

- a. Does any juror have a close relation who is employed by the Wayland Police Department, Wayland Fire Department, Town of Wayland, Natick Police Department, Natick Fire Department or Town of Natick?
- b. Has any juror ever filed suit against the Wayland Police Department, Wayland Fire Department, Town of Wayland, Natick Police Department, Natick Fire Department, Town of Natick and/or one of its employees?
- c. Has any juror ever filed suit against any police department, fire department and/or municipalities and/or one of its employees?
- d. Would any juror be less likely to credit the testimony of a witness if that witness was a law enforcement officer?

- e. Would any juror be less likely to credit the testimony of a witness if that witness was a town employee or an employee of a fire department?
- f. Would any juror be influenced by media accounts of instances of police misconduct?
- g. Have you or any member of your family, or any close friend ever been the subject of a law enforcement official's investigation?
- h. Do you harbor any ill feelings toward law enforcement as a profession?
- i. Does anyone on the jury believe that he or she or members of his or her family, friends, or acquaintances have been unreasonably treated in any fashion by police officers?

Respectfully Submitted,
Defendants,
Town of Wayland Police Department, Robert
Irving, and in his capacity of Chief of the
Wayland Police Department Daniel Sauro,
By Their Attorney,

/s/ Jeremy I. Silverfine
Jeremy Silverfine, BBO# 542779
Leonard H. Kesten, BBO# 542042
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Dated: January 17, 2006